

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

ABBVIE INC., et al.,

Defendants.

Case Number: 2:14-CV-5151-HB

**Declaration in Support of Plaintiff Federal Trade Commission's
Motion to Compel AbbVie Defendants to Produce Documents Improperly
Withheld on Privilege Grounds from their Pennsylvania Privilege Logs**

I, Patricia M. McDermott, declare as follows:

1. I am an attorney licensed to practice in the District of Columbia representing the Federal Trade Commission ("FTC") in the above-captioned matter. I made my appearance in this case pursuant to Local Rule 83.5(e).
2. I submit this declaration in support of the FTC's Motion to Compel AbbVie Defendants to Produce Documents Improperly Withheld on Privilege Grounds from their Pennsylvania Privilege Logs.
3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the Privilege Log entries challenged by the FTC in this motion. Exhibit 1 is a compilation of the most current version of each of the challenged log entries produced by the AbbVie Defendants.
4. Attached hereto as Exhibit 2 is a true and accurate copy of the document for privilege log entry 2230, produced in this litigation as Bates No. AGEL-PA-006-0487546.

5. Attached hereto as Exhibit 3 is a true and accurate copy of the document for privilege log entry 600, produced in this litigation as Bates No. AGEL-PA-006-0320603.
6. Attached hereto as Exhibit 4 is a true and accurate copy of the document for privilege log entry 2488, produced in this litigation as Bates No. AGEL-PA-006-0543050.
7. Attached hereto as Exhibit 5 is a true and accurate copy of the document for privilege log entry 2489, produced in this litigation as Bates No. AGEL-PA-006-0543052.
8. Attached hereto as Exhibit 6 is a true and accurate copy of the document produced in this litigation as Bates No. AGEL-PA-006-0532125.
9. Attached hereto as Exhibit 7 is a true and accurate copy of the document for privilege log entry 656, produced in this litigation as Bates No. AGEL-PA-006-0545046.
10. Attached hereto as Exhibit 8 is a true and accurate copy of the document for privilege log entry 2103, produced in this litigation as Bates No. AGEL-PA-006-0552802.
11. Attached hereto as Exhibit 9 is a true and accurate copy of the document for privilege log entry 1739, produced in this litigation as Bates No. AGEL-PA-006-0554367.
12. Attached hereto as Exhibit 10 is a true and accurate copy of the document for privilege log entry 1178, produced in this litigation as Bates No. AGEL-PA-006-0551827.
13. Attached hereto as Exhibit 11 is a true and accurate copy of the document produced in this litigation as Bates No. AGEL-PA-006-0557417.
14. Attached hereto as Exhibit 12 is a true and accurate copy of the document for privilege log entry 921, produced in this litigation as Bates No. AGEL-PA-006-0475914.
15. Attached hereto as Exhibit 13 is a true and accurate copy of the document for privilege log entry 2412, produced in this litigation as Bates No. AGEL-PA-006-0542453.

16. Attached hereto as Exhibit 14 is a true and accurate copy of the document for privilege log entry 2448, produced in this litigation as Bates No. AGEL-PA-006-0557407.
17. Attached hereto as Exhibit 15 is a true and accurate copy of the document produced in this litigation as Bates No. AGEL-PA-006-0001724.
18. Attached hereto as Exhibit 16 is a true and accurate copy of a letter from Adam Lawton, Esq. to Patricia McDermott, Esq., dated May 6, 2016.
19. Attached hereto as Exhibit 17 is a true and accurate copy of the document for privilege log entry 538, produced in this litigation as Bates No. AGEL-PA-006-0544562.
20. Attached hereto as Exhibit 18 is a true and accurate copy of the document for privilege log entry 539, produced in this litigation as Bates Nos. AGEL-PA-006-0544594.

I declare under penalty of perjury that the foregoing is true and correct

Dated: June 30, 2016


Patricia M. McDermott